

only partially serves. Across Wilkes' wirecenters the average population density figure is 43.44. The Ferguson wirecenter has the lowest population density of all of Wilkes' wirecenters. US Cellular's only reason for excluding part of that wirecenter is due to the fact that US Cellular's FCC licensed service area does not extend to the entire wirecenter. In Star's study area the range of population densities is from 10.05 to 65.31 across its wirecenters and the average population density of all of its wirecenters is 36.10. In Star's study area, US Cellular entirely serves or partially serves wirecenters with an average population density of 35.17, which is just below the study area average. In the Randolph Telephone Membership Corporation ("Randolph") study area, the population densities range from 29.98 to 65.85 with an average population density of 49.72. In this study area US Cellular entirely or partially serves the Bennett, Coleridge and High Falls wirecenters which have population densities of 47.71, 51.44 and 48.78, respectively. These population densities reflect densities which are the nearest to average of the population densities of Randolph's entire study area. In the Coleridge wirecenter which US Cellular only partially serves, the population density of the area within US Cellular's CGSA is 48.15 as opposed to the higher population density of 61.25 in the portion which is outside of US Cellular's CGSA. In YadkinValley Telephone Membership Co.'s ("Yadkin") study area, the population densities range from 40.83 to 285.09 with an average population density of 105.67. Due to the constraints of US Cellular's FCC-authorized service area, US Cellular only partially serves five of the ten Yadkin wirecenters. The average population density of the area that US Cellular serves is 103.63 while the average population density of the partial wirecenters area that US Cellular serves is 74.47, both of which are lower than the overall study area average. US Cellular serves nearly all of Sprint Mid-Atlantic's ("Sprint") large study area, which has a population density range of 9.20 to 1542.21 and an average population density of 135.38. The wirecenters that US

Cellular does not serve or only partially serves due to its FCC-authorized service area represent a range of population densities and have an average of 287.04 which is well above Sprint's overall average, clearly indicating that US Cellular is not trying to avoid serving the less populated/higher cost areas. Finally, with respect to the Citizens Telephone Company, Ellerbe Telephone Company, Inc., MEBTEL, Inc. and Randolph Telephone Company study areas, these study areas consists of only one wirecenter each. In all of these wirecenters the population density of the portion that US Cellular does serve is less than the population density of the portion US Cellular does not serve. Based upon the FCC's decision in Virginia Cellular that stated that, "a low population density typically indicates a high-cost area," the population density figures provided here demonstrate that no uneconomic support is proposed.⁴⁹

VII. High-Cost Certification

62. Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify with the FCC and the Universal Service Administrative Corporation ("USAC") their compliance with Section 254(e) of the Federal Telecommunications Act of 1996. 47 C.F.R. §§ 54.313, 54.314. US Cellular attaches its high-cost certification letter as Exhibit F hereto. US Cellular respectfully requests that the FCC issue a finding that US Cellular has met the high-cost certification requirement and that US Cellular is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.⁵⁰

⁴⁹ *Id* at para. 34.

⁵⁰ See, e.g. *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, CC Docket 96-45 (filed Feb. 6, 2002).

VIII. Anti-drug Abuse Certification

63. US Cellular certifies that no party to this petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. *See* Exhibit G hereto.

WHEREFORE, pursuant to Section 214(e)(2) of the Act, US Cellular respectfully requests that the Commission, (1) enter an Order designating US Cellular as an ETC for its requested ETC service area as shown on Exhibit A hereto, and (2) certify to the FCC that US Cellular will use the support for its intended purpose.

Respectfully submitted,

**North Carolina RSA #4, Inc.
North Carolina RSA No. 6, Inc.
USCOC of North Carolina RSA #7, Inc.
North Carolina RSA #9, Inc.
Jacksonville Cellular Telephone Company
Wilmington Cellular Telephone Company**

By: B. Lynn F. Ratnavale
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October 14, 2004

Exhibit A

MAP OF PROPOSED SERVICE AREA

Exhibit B
Non-Rural ILECs

<u>Company Name</u>	<u>Locality</u>	<u>WireCenter Code</u>
Central Telephone Co. - Virginia	Virgilina	VRGLVAXA
Verizon South, Inc. - NC	Durham	DRHMNCXB
Verizon South, Inc. - NC	Durham	DRHMNCXE
Verizon South, Inc. - NC	Durham	DRHMNCXM
Verizon South, Inc. - NC	Durham	DRHMNCXC
Verizon South, Inc. - NC	Durham	DRHMNCXT
Verizon South, Inc. - NC	Durham	DRHMNCXD
Verizon South, Inc. - NC	Butner	CRDMNCXA
Verizon South, Inc. - NC	Creedmoor	CRDMNCXM
Verizon South, Inc. - NC (Contel)	Hot Springs	HTSPNCXA
Verizon South, Inc. - NC (Contel)	Guntertown	GTTWNCXA
Verizon South, Inc. - NC (Contel)	Marshall	MRSNCXA
Verizon South, Inc. - NC (Contel)	Mars Hill	MRHLNCXA
Verizon South, Inc. - NC (Contel)	Weaverville	WVVLNCXA
Verizon South, Inc. - NC (Contel)	Burnsville	BRVLNCXA
Verizon South, Inc. - NC (Contel)	Burnsville	MIVLNCXA
Verizon South, Inc. - NC (Contel)	Bakersville	BAVLNCXA
Verizon South, Inc. - NC (Contel)	Old Fort	OLFTNCXA
Verizon South, Inc. - NC (Contel)	Marion	GWPRNCXA
Verizon South, Inc. - NC (Contel)	Marion	GRCYNCXA
Verizon South, Inc. - NC (Contel)	Sevier	SEVRNCXA
Verizon South, Inc. - NC (Contel)	Marion	MARNNCXA
Bell South Telecomm, Inc. dba Southern Bell Tel	Clyde	CLYDNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Canton	CNTNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Candler	ENKANCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Horseshoe	HNVLCMI
Bell South Telecomm, Inc. dba Southern Bell Tel	Hendersonville	HNVLCCH
Bell South Telecomm, Inc. dba Southern Bell Tel	Leicester	LCSRNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Asheville	AHVLNCOH
Bell South Telecomm, Inc. dba Southern Bell Tel	Asheville	AHVLNCOT
Bell South Telecomm, Inc. dba Southern Bell Tel	Asheville	AHVLNCBI
Bell South Telecomm, Inc. dba Southern Bell Tel	Hendersonville	HNVLCED
Bell South Telecomm, Inc. dba Southern Bell Tel	Fairview	FRVWNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Arden	ARDNCCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Swannanoa	SWNNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Black Mount	BCMTNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Lake Lure	LKLRNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Spruce Pine	SPPNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Rutherfordton	RTTNCCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Newland	NWLDNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Morganton	MGTNNCGL
Bell South Telecomm, Inc. dba Southern Bell Tel	Morganton	MGTNNCGR
Bell South Telecomm, Inc. dba Southern Bell Tel	Boone	BOONNCYI
Bell South Telecomm, Inc. dba Southern Bell Tel	Lenoir	LENRNCHA
Bell South Telecomm, Inc. dba Southern Bell Tel	First City	FRCYNCCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Ellenboro	ELBONCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Caroleen	CRLNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Lattimore	LTMRNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Shelby	SHLBNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Lawndale	LWDLNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Grover	GRVRNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Cherryville	CHVLNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Vale	LNNNNCVA
Bell South Telecomm, Inc. dba Southern Bell Tel	Newton	NWTNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Taylorsville	TYVLNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Hamlet	HMLTNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Laurenburg	LRBGNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Rowland	RWLDNCMA

Exhibit B
Non-Rural ILECs

Bell South Telecomm, Inc. dba Southern Bell Tel	Pembroke	PMBRNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Fairmont	FAMTNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Lumberton	LMTNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Acme	ACMENCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Atkinson	ATSNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Wilmington	WLMGNCLE
Bell South Telecomm, Inc. dba Southern Bell Tel	South Point	SOPTNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Long Beach	LNBHNCMS
Bell South Telecomm, Inc. dba Southern Bell Tel	Carolina Beach	CRBHNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Wilmington	WGVLCNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Wilmington	WLMGNCFO
Bell South Telecomm, Inc. dba Southern Bell Tel	Wilmington	WLMGNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Castle Hane	CSHYNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Burgaw	BRGWNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Hampsted	SCHLNCHA
Bell South Telecomm, Inc. dba Southern Bell Tel	Goldsboro	GNHMNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Mount Olive	MTOLNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Goldsboro	GLBONCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Goldsboro	GLBONCAD
Bell South Telecomm, Inc. dba Southern Bell Tel	Selma	SELMNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Garner	RLGHNCGA
Bell South Telecomm, Inc. dba Southern Bell Tel	Apex	APEXNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Raleigh	RLGHNC
Bell South Telecomm, Inc. dba Southern Bell Tel	Raleigh	RLGHNCAB
Bell South Telecomm, Inc. dba Southern Bell Tel	Knight Dale	KNDLNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Wendell	WNDLNCPI
Bell South Telecomm, Inc. dba Southern Bell Tel	Zebulon	ZBLNNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Cary	CARYNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Chapel Hill	CPHLNCRO
Bell South Telecomm, Inc. dba Southern Bell Tel	Graham	SXPHNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Raleigh	RLGHNCSE
Bell South Telecomm, Inc. dba Southern Bell Tel	Burlington	BURLNCDA
Bell South Telecomm, Inc. dba Southern Bell Tel	Burlington	BURLNCHA
Bell South Telecomm, Inc. dba Southern Bell Tel	Gibsonville	GBVLNCXA
Bell South Telecomm, Inc. dba Southern Bell Tel	Elon College	BURLNCEL
Bell South Telecomm, Inc. dba Southern Bell Tel	Greensboro	GNBONCLA
Bell South Telecomm, Inc. dba Southern Bell Tel	Greensboro	GNBONCMC
Bell South Telecomm, Inc. dba Southern Bell Tel	Monticello	MNTINCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Summerfield	SRFDNCCE
Bell South Telecomm, Inc. dba Southern Bell Tel	Reidsville	RDVLNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Reidsville	RDVLNCSE
Bell South Telecomm, Inc. dba Southern Bell Tel	Ruffin	RFFNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Anderson	ARSNNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Gatewood	GTWDNCMA
Bell South Telecomm, Inc. dba Southern Bell Tel	Milton	MLTNNCMA

Exhibit C
Rural ILECs Where US Cellular Provides 100% Coverage

Page 1

<u>Company Name</u>	<u>Wirecenter Code</u>	<u>Locality</u>
Tri -County Telephone Membership Corporation	PNTWNCXA	Pine Town
Tri -County Telephone Membership Corporation	PKRDNCXA	Pantego
Tri -County Telephone Membership Corporation	SDNYNCXA	Bath
Atlantic Telephone Membership Corporation	LGWDNCXA	Longwood
Atlantic Telephone Membership Corporation	SESDNCXA	Ocean Island Beach
Atlantic Telephone Membership Corporation	SHLTNCXA	Shallotte
Atlantic Telephone Membership Corporation	BOLVNCXA	Bolivia
Atlantic Telephone Membership Corporation	HLBHNCXA	Supply
Atlantic Telephone Membership Corporation	BSLKMOXA	Boiling Spring Lake
Barnardsville Telephone Company	BDVLNCXA	Barnardsville
Saluda Mountain Telephone Company	SALDNCXA	Saluda
Star Telephone Membership Corporation	ABBGNCXA	Bladenboro
Star Telephone Membership Corporation	LSBNNCXA	Lisbon
Star Telephone Membership Corporation	CKTNNCXA	Clarkton
Star Telephone Membership Corporation	KLLYNCXA	Kelly
Star Telephone Membership Corporation	HRLSNCXA	Harrells
Star Telephone Membership Corporation	GRLDNCXA	Garland
Star Telephone Membership Corporation	CYCKNCXA	Garland
Star Telephone Membership Corporation	WHOKNCXA	White Oak
Star Telephone Membership Corporation	HRNGNCXA	Clinton
Star Telephone Membership Corporation	CLTNNCXA	Clinton
Star Telephone Membership Corporation	SXRNNCXA	Turkey
Star Telephone Membership Corporation	COHRNCXA	Dunn
Star Telephone Membership Corporation	SORVNCXA	Roseboro
Service Telephone Company	FRBLNCXA	Fair Bluff

Exhibit D**Rural ILEC Wire Centers Requiring Reclassification Along Wire Center Boundaries**

<u>Company Name</u>	<u>Wirecenter Code</u>	<u>Locality</u>	<u>Served</u>	<u>Entire/Partial</u>
Alltel Carolina - North, Inc.	ASVLNCXA	Ansonville	N	
Alltel Carolina - North, Inc.	DNTNNCXA	Denton	N	
Alltel Carolina - North, Inc.	GRQYNCXA	Great Orr Creek	N	
Alltel Carolina - North, Inc.	HMBRNCXA	Hemby Bdg	N	
Alltel Carolina - North, Inc.	INTRNCXA	Indian Trail	N	
Alltel Carolina - North, Inc.	LLVLNCXA	Lilesville	N	
Alltel Carolina - North, Inc.	LRHLNCXA	Laurel Hill	N	
Alltel Carolina - North, Inc.	LWVLNCXA	Lewisville	N	
Alltel Carolina - North, Inc.	MHVLCXA	Marshville	N	
Alltel Carolina - North, Inc.	MRVINCXA	Mooresville	N	
Alltel Carolina - North, Inc.	MRVNNCXA	Morven	N	
Alltel Carolina - North, Inc.	MTHWNCXB	Matthews	N	
Alltel Carolina - North, Inc.	NRWDNCXA	Norwood	N	
Alltel Carolina - North, Inc.	NWSLNCXA	New Salem	N	
Alltel Carolina - North, Inc.	PCLDNCXA	Peach Pktn	N	
Alltel Carolina - North, Inc.	SLVLNCXA	Stanleyville	N	
Alltel Carolina - North, Inc.	WDBONCXA	Wadesboro	N	
Alltel Carolina - North, Inc.	WNGTNCXA	Wingate	N	
Alltel Carolina - North, Inc.	WXHWNCXA	Waxhaw	N	
Alltel Carolina - North, Inc.	ABRDNCXA	Aberdeen	Y	Entire
Alltel Carolina - North, Inc.	BRWYNCXA	Broadway	Y	Entire
Alltel Carolina - North, Inc.	CLMBNCXA	Columbus	Y	Entire
Alltel Carolina - North, Inc.	GRCKNCXA	Green Creek	Y	Entire
Alltel Carolina - North, Inc.	KINGNCXA	King	Y	Entire
Alltel Carolina - North, Inc.	LWLNNCXA	Lewisville	Y	Partial
Alltel Carolina - North, Inc.	OLIVNCXA	Olivia	Y	Entire
Alltel Carolina - North, Inc.	OLTWNCXA	Winston-Salem	Y	Partial
Alltel Carolina - North, Inc.	PNBLNCXA	Pine Bluff	Y	Partial
Alltel Carolina - North, Inc.	RRHLNCXA	Rural Hall	Y	Partial
Alltel Carolina - North, Inc.	SNFRNCXA	Sanford	Y	Entire
Alltel Carolina - North, Inc.	TRYNNCXA	Tryon	Y	Entire
Alltel Carolina - North, Inc.	WGRNNCXA	Wagram	Y	Entire
Central Telephone Company - North Carolina	ASBONCXA	Ashboro	Y	Partial
Central Telephone Company - North Carolina	ASBONCXB	Ashboro	N	
Central Telephone Company - North Carolina	BHLHNCXA	Bethlehem	N	
Central Telephone Company - North Carolina	BISCNCXA	Biscoe	Y	Partial
Central Telephone Company - North Carolina	BNVLNCXA	Boonville	Y	Partial
Central Telephone Company - North Carolina	CNDRNCXA	Candor	Y	Partial
Central Telephone Company - North Carolina	CTWBNCXA	Catawba	N	
Central Telephone Company - North Carolina	DBSNNCXB	Dobson	N	
Central Telephone Company - North Carolina	DNBRNCXA	Danbury	Y	Partial
Central Telephone Company - North Carolina	DRHMNCXA	Durham	N	
Central Telephone Company - North Carolina	EDENNCXA	Eden	Y	Entire
Central Telephone Company - North Carolina	EDENNCXB	Eden	Y	Entire
Central Telephone Company - North Carolina	ELKNNCXA	Elkin	Y	Entire
Central Telephone Company - North Carolina	GRFLNCXA	Granite Falls	N	
Central Telephone Company - North Carolina	HAYSNCXA	Hays	N	
Central Telephone Company - North Carolina	HCKRNCXA	Hickory	N	
Central Telephone Company - North Carolina	HCKRNCXB	Hickory	N	
Central Telephone Company - North Carolina	HLBONCXA	Hillsborough	Y	Partial
Central Telephone Company - North Carolina	HLDBNCXB	Hildebran	N	
Central Telephone Company - North Carolina	MDSNNCXA	Madison	Y	Entire
Central Telephone Company - North Carolina	MKVLNCXA	Mocksville	N	
Central Telephone Company - North Carolina	MLBYNCXB	Mulberry	N	
Central Telephone Company - North Carolina	MTARNCXA	Mount Airy	Y	Entire
Central Telephone Company - North Carolina	MTGLNCXA	Mt. Gilead	N	
Central Telephone Company - North Carolina	MTVWNCXA	Mt. View	N	
Central Telephone Company - North Carolina	NWBONCXA	N. Wilkesboro	N	

Exhibit D**Rural ILEC Wire Centers Requiring Reclassification Along Wire Center Boundaries**

Central Telephone Company - North Carolina	PLMTNCXA	Pilot Mount	Y	Entire
Central Telephone Company - North Carolina	PRHLNCXA	Prospect Hill	Y	Entire
Central Telephone Company - North Carolina	QKGPNCXA	Walnut Cove	Y	Partial
Central Telephone Company - North Carolina	RMSRNCXA	Ramseur	Y	Partial
Central Telephone Company - North Carolina	RRGPNCXA	Roaring Gap	Y	Entire
Central Telephone Company - North Carolina	RXBONCXA	Roxboro	Y	Entire
Central Telephone Company - North Carolina	SEGVNCXA	Seagrove	N	
Central Telephone Company - North Carolina	SHFRNCXA	Sherills Field	N	
Central Telephone Company - North Carolina	SNRGNCXA	Sandy Ridge	Y	Partial
Central Telephone Company - North Carolina	STRDNCXA	State Road	Y	Entire
Central Telephone Company - North Carolina	STVLNCXA	Stoneville	Y	Entire
Central Telephone Company - North Carolina	TMLKNCXA	Rougemont	Y	Entire
Central Telephone Company - North Carolina	TROYNCXA	Troy	N	
Central Telephone Company - North Carolina	VLDSNCXA	Valdese	N	
Central Telephone Company - North Carolina	WENDNCXA	Wend	Y	Entire
Central Telephone Company - North Carolina	WJSNNCXA	W. Jefferson	Y	Entire
Central Telephone Company - North Carolina	WKTWNCXA	Walkertown	Y	Partial
Central Telephone Company - North Carolina	WLCVNCXA	Walnut Cove	Y	Partial
Central Telephone Company - North Carolina	YCVLNCXA	Yanceyville	Y	Entire
Central Telephone Company - North Carolina	YDVLNCXA	Yadkinville	Y	Partial
Citizens Telephone Company	BRVRNCXA	Brevard	Y	Partial
Ellerbe Telephone Company, Inc.	ELRBNCXA	Ellerbe		Partial
MEBTEL, Inc.	MEBNNCXA	Mebane	Y	Partial
Randolph Telephone Company	LBRTNCXA	Liberty	Y	Partial
Randolph Telephone Membership Corporation	BDLKNCXA	Badin Lake	N	
Randolph Telephone Membership Corporation	BNNTNCXA	Bennett	Y	Entire
Randolph Telephone Membership Corporation	CLRGNCXA	Coleridge	Y	Partial
Randolph Telephone Membership Corporation	FRMRNCXA	Farmer	N	
Randolph Telephone Membership Corporation	HGHFNCXA	High Falls	Y	Entire
Randolph Telephone Membership Corporation	JKCKNCXA	Jackson Creek	N	
Randolph Telephone Membership Corporation	PSGHNCXA	Pisagh	N	
Skyline Telephone Membership Corporation	BEMTNCXA	Beech Mount	N	
Skyline Telephone Membership Corporation	BLDWNCXA	West Jefferson	Y	Entire
Skyline Telephone Membership Corporation	BNELNCXA	Banner Elk	N	
Skyline Telephone Membership Corporation	CETNNCXA	Creston	Y	Entire
Skyline Telephone Membership Corporation	GLCKNCXA	Glade Creek	Y	Entire
Skyline Telephone Membership Corporation	LNNGNCXA	Lansing	Y	Entire
Skyline Telephone Membership Corporation	NTCKNCXA	Nathans Creek	Y	Entire
Skyline Telephone Membership Corporation	SCVLNCXA	Laurel Springs	Y	Entire
Skyline Telephone Membership Corporation	SGGVNCXA	Sugar Grove	N	
Skyline Telephone Membership Corporation	SPRTNCXA	Sparta	Y	Entire
Skyline Telephone Membership Corporation	WATGNCXA	Watauga	N	
Sprint Mid-Atlantic	AHSKNCXA	Ahoskie	Y	Entire
Sprint Mid-Atlantic	ALNDNCXA	Aulander	Y	Entire
Sprint Mid-Atlantic	ANGRNCA	Angier	Y	Entire
Sprint Mid-Atlantic	ATLTNCXA	Atlantic	Y	Entire
Sprint Mid-Atlantic	AURRNCXA	Aurora	Y	Entire
Sprint Mid-Atlantic	AYDNNCXA	Ayden	Y	Entire
Sprint Mid-Atlantic	BALYNCXA	Bailey	Y	Entire
Sprint Mid-Atlantic	BATHNCXA	Bath	Y	Entire
Sprint Mid-Atlantic	BETHNCXA	Bethel	Y	Entire
Sprint Mid-Atlantic	BEVLNCXA	Beulaville	Y	Entire
Sprint Mid-Atlantic	BLBONCXA	Blandenboro	Y	Entire
Sprint Mid-Atlantic	BLHNNCXA	Belhaven	Y	Entire
Sprint Mid-Atlantic	BNSNNCXA	Benson	Y	Entire
Sprint Mid-Atlantic	BONLNCXA	Bonlee	Y	Entire
Sprint Mid-Atlantic	BUFTNCXA	Beaufort	Y	Entire
Sprint Mid-Atlantic	BXTNNCXA	Buxton	Y	Entire
Sprint Mid-Atlantic	BXTNNCXB	Buxton	Y	Entire

Exhibit D**Rural ILEC Wire Centers Requiring Reclassification Along Wire Center Boundaries**

Sprint Mid-Atlantic	BYBONCX	Bayboro	Y	Entire
Sprint Mid-Atlantic	CHDBNCX	Chadbourn	Y	Entire
Sprint Mid-Atlantic	CKTNNCX	Clarkton	Y	Entire
Sprint Mid-Atlantic	CLMANCX	Columbia	Y	Entire
Sprint Mid-Atlantic	CLRNNCX	Colerain	Y	Entire
Sprint Mid-Atlantic	CNJCNXC	Coinjock	Y	Partial
Sprint Mid-Atlantic	CNWNXCX	Conway	Y	Entire
Sprint Mid-Atlantic	CRTHNCX	Carthage	Y	Entire
Sprint Mid-Atlantic	CRWLNCX	Creswell	Y	Entire
Sprint Mid-Atlantic	CYTNNCX	Clayton	Y	Entire
Sprint Mid-Atlantic	DUNNNCX	Dunn	Y	Entire
Sprint Mid-Atlantic	DUNNNCXB	Erwin/Dunn	Y	Entire
Sprint Mid-Atlantic	EDTNNCX	Edenton	Y	Entire
Sprint Mid-Atlantic	ELCYNCX	Elizabeth City	Y	Entire
Sprint Mid-Atlantic	EMCYNCX	Elm City	N	
Sprint Mid-Atlantic	ENFDNCX	Enfield	Y	Entire
Sprint Mid-Atlantic	ENGLNCX	Engelhard	Y	Entire
Sprint Mid-Atlantic	EZTWNCX	Elizabethtown	Y	Entire
Sprint Mid-Atlantic	FASNNCX	Faison	Y	Entire
Sprint Mid-Atlantic	FKTNNCX	Franklinton	Y	Entire
Sprint Mid-Atlantic	FONTNCX	Fountain	Y	Entire
Sprint Mid-Atlantic	FQVRNCX	Fuquay Varina	Y	Entire
Sprint Mid-Atlantic	FRMTNCX	Fremont	Y	Entire
Sprint Mid-Atlantic	FROKNCX	Four Oaks	Y	Entire
Sprint Mid-Atlantic	FRVLNCX	Farmville	Y	Entire
Sprint Mid-Atlantic	FYCLNCXF	Fayetteville	Y	Partial
Sprint Mid-Atlantic	FYVLNCX	Fayetteville	Y	Partial
Sprint Mid-Atlantic	FYVLNCXB	Fayetteville	Y	Partial
Sprint Mid-Atlantic	FYVLNCXD	Ft. Bragg	Y	Entire
Sprint Mid-Atlantic	FYVLNCXG	Fayetteville	Y	Entire
Sprint Mid-Atlantic	GBVLNCX	Gibsonville	N	
Sprint Mid-Atlantic	GFTNNCX	Grifton	Y	Entire
Sprint Mid-Atlantic	GLDSNCX	Goldston	Y	Entire
Sprint Mid-Atlantic	GNVLNCX	Greenville	Y	Entire
Sprint Mid-Atlantic	GNVLNCXB	Greenville	Y	Entire
Sprint Mid-Atlantic	GRLDNCX	Garland	N	
Sprint Mid-Atlantic	GTVLNCX	Eure/Gatesville	Y	Entire
Sprint Mid-Atlantic	HLFXNCX	Halifax	Y	Entire
Sprint Mid-Atlantic	HLRGNCX	Holly Ridge	Y	Entire
Sprint Mid-Atlantic	HMTNNCX	Hamilton	Y	Entire
Sprint Mid-Atlantic	HNSNNCX	Henderson	Y	Entire
Sprint Mid-Atlantic	HRFRNCX	Hertford	Y	Entire
Sprint Mid-Atlantic	HVLCNCX	Havelock	Y	Entire
Sprint Mid-Atlantic	JCSNNCX	Jackson	Y	Entire
Sprint Mid-Atlantic	JCVLNCX	Jacksonville	Y	Entire
Sprint Mid-Atlantic	JCVLNCXB	Jacksonville	N	
Sprint Mid-Atlantic	KDHLNCX	Kill Devil Hills	Y	Entire
Sprint Mid-Atlantic	KDHLNCXB	Kitty Hawk	Y	Entire
Sprint Mid-Atlantic	KNLYNCX	Kenly	Y	Entire
Sprint Mid-Atlantic	KNVLNCX	Kenansville	Y	Entire
Sprint Mid-Atlantic	KRVLNCX	Kemersville	Y	Partial
Sprint Mid-Atlantic	KSTNNCX	Kinston	Y	Entire
Sprint Mid-Atlantic	LGRNNCX	La Grange	Y	Entire
Sprint Mid-Atlantic	LKWNCX	Lake Waccamaw	Y	Entire
Sprint Mid-Atlantic	LLTNNCX	Lillington	Y	Entire
Sprint Mid-Atlantic	LSBGNCX	Louisburg	Y	Entire
Sprint Mid-Atlantic	LSTNNCX	Lewiston/Woodville	Y	Entire
Sprint Mid-Atlantic	LTTNNCX	Littleton	Y	Entire
Sprint Mid-Atlantic	LUCANCX	Lucama	Y	Entire

Exhibit D**Rural ILEC Wire Centers Requiring Reclassification Along Wire Center Boundaries**

Sprint Mid-Atlantic	MAMINCXA	Harbinger/Mamie	Y	Entire
Sprint Mid-Atlantic	MANTNCXA	Manteo	Y	Partial
Sprint Mid-Atlantic	MOYCNCXA	Moyock	Y	Partial
Sprint Mid-Atlantic	MOYCNCXB	Moyock/Sligo	Y	Partial
Sprint Mid-Atlantic	MRBGNCXA	Stacy/Marshallbg	Y	Entire
Sprint Mid-Atlantic	MRBONCXA	Murfreesboro	Y	Entire
Sprint Mid-Atlantic	MRCYNCXA	Morehead City	Y	Entire
Sprint Mid-Atlantic	MSHLNCXA	Deep Run/Moss H	Y	Entire
Sprint Mid-Atlantic	MSTNNCXA	Maxton	Y	Entire
Sprint Mid-Atlantic	MYVLNCXA	Maysville	Y	Entire
Sprint Mid-Atlantic	NRLNNCXA	Norlina	Y	Entire
Sprint Mid-Atlantic	NSVLNCXA	Nashville	Y	Entire
Sprint Mid-Atlantic	NWBRNCXA	New Bern	Y	Entire
Sprint Mid-Atlantic	NWGVNCXA	Newton Grove	Y	Entire
Sprint Mid-Atlantic	NWPTNCXA	Newport	Y	Entire
Sprint Mid-Atlantic	OCRCNCXA	Ocracoke	Y	Entire
Sprint Mid-Atlantic	ORNTNCXA	Oriental	Y	Entire
Sprint Mid-Atlantic	OXFRNCXA	Oxford	Y	Entire
Sprint Mid-Atlantic	PCVLNCXA	Pollocksville	Y	Entire
Sprint Mid-Atlantic	PKHLNCXA	Pink Hill	Y	Entire
Sprint Mid-Atlantic	PKTNNCXA	Parkton	Y	Entire
Sprint Mid-Atlantic	PLMONCXA	Plymouth	Y	Entire
Sprint Mid-Atlantic	PNHRNCXA	PineHurst	Y	Entire
Sprint Mid-Atlantic	PNTNNCXA	Pinetops	Y	Entire
Sprint Mid-Atlantic	PRTNNCXA	Princeton	Y	Entire
Sprint Mid-Atlantic	PTBONCXA	Pittsboro	Y	Entire
Sprint Mid-Atlantic	PYWDNCXA	Belvidere/Piney W	Y	Entire
Sprint Mid-Atlantic	RAFDNCXA	Raeford	Y	Entire
Sprint Mid-Atlantic	RBNXNCXA	Robbins	Y	Entire
Sprint Mid-Atlantic	RBVLNCXA	Robersonville	Y	Entire
Sprint Mid-Atlantic	RCLDNCXA	Richlands	Y	Entire
Sprint Mid-Atlantic	RCMTNCXA	Rocky Mount	Y	Entire
Sprint Mid-Atlantic	RCMTNCXB	Rocky Mount	N	
Sprint Mid-Atlantic	RCSQNCXA	Rich Square	Y	Entire
Sprint Mid-Atlantic	RDSPNCXA	Red Springs	Y	Entire
Sprint Mid-Atlantic	RNRPNCXA	Roanoke Rapids	Y	Entire
Sprint Mid-Atlantic	RSBONCXA	Roseboro	Y	Entire
Sprint Mid-Atlantic	RSHLNCXA	Rose Hill	Y	Entire
Sprint Mid-Atlantic	RXBLNCXA	Roxobel	Y	Entire
Sprint Mid-Atlantic	SBRDNCXA	Seaboard	Y	Entire
Sprint Mid-Atlantic	SCNKNCXA	Scotland Neck	Y	Entire
Sprint Mid-Atlantic	SHLHNCXA	Camden/Shiloh	Y	Partial
Sprint Mid-Atlantic	SLCYNCXA	Siler City	Y	Entire
Sprint Mid-Atlantic	SMFDNCXA	Smithfield	Y	Entire
Sprint Mid-Atlantic	SNBYNCXA	Sunbury	Y	Entire
Sprint Mid-Atlantic	SNFYNCXA	Sneads Ferry	Y	Entire
Sprint Mid-Atlantic	SNHLNCXA	Snow Hill	Y	Entire
Sprint Mid-Atlantic	SPNSNCXA	Southern Pines	Y	Entire
Sprint Mid-Atlantic	SPRHNCXA	Spring Hope	Y	Entire
Sprint Mid-Atlantic	STBGNCXA	Stantonsburg	Y	Entire
Sprint Mid-Atlantic	STMLNCXA	South Mills	Y	Entire
Sprint Mid-Atlantic	STPLNCXA	St. Pauls	Y	Entire
Sprint Mid-Atlantic	SWNQNCXA	Swan Quarter	Y	Entire
Sprint Mid-Atlantic	SWNSNCXA	Emerald Isle	Y	Entire
Sprint Mid-Atlantic	SWNSNCXA	Swanboro	Y	Entire
Sprint Mid-Atlantic	TBCYNCXA	Tabor City	Y	Entire
Sprint Mid-Atlantic	TPISNCXA	Sneads/Top Sail	Y	Entire
Sprint Mid-Atlantic	TRBONCXA	Tarboro	Y	Entire
Sprint Mid-Atlantic	TRENNCXA	Trenton	Y	Entire

Exhibit D**Rural ILEC Wire Centers Requiring Reclassification Along Wire Center Boundaries**

Sprint Mid-Atlantic	VASSNCXA	Vass	Y	Entire
Sprint Mid-Atlantic	VNBONCXA	Vanceboro	Y	Entire
Sprint Mid-Atlantic	WASHNCXA	Washington	Y	Entire
Sprint Mid-Atlantic	WAVENCXA	Waves	Y	Entire
Sprint Mid-Atlantic	WDLNCXA	Woodland	Y	Entire
Sprint Mid-Atlantic	WDVLNCXA	Woodville	Y	Entire
Sprint Mid-Atlantic	WHPNNCXA	Carthage/Whisper	Y	Entire
Sprint Mid-Atlantic	WHTKNCXA	Whitakers	Y	Entire
Sprint Mid-Atlantic	WHVLNCXA	Whiteville	Y	Entire
Sprint Mid-Atlantic	WITNNCXA	Winton	Y	Entire
Sprint Mid-Atlantic	WKFSNCXA	Wake Forest	Y	Entire
Sprint Mid-Atlantic	WKVLNCXA	Weeksville	Y	Entire
Sprint Mid-Atlantic	WLCHNCXA	Yner/Welch	Y	Entire
Sprint Mid-Atlantic	WLDNNCXA	Weldon	Y	Entire
Sprint Mid-Atlantic	WLLCNCXA	Wallace	Y	Entire
Sprint Mid-Atlantic	WLSNNCXA	Wilson	Y	Entire
Sprint Mid-Atlantic	WMTNNCXA	Williamston	Y	Entire
Sprint Mid-Atlantic	WNDSNCXA	Windsor	N	
Sprint Mid-Atlantic	WRSWNCXA	Warsaw	Y	Entire
Sprint Mid-Atlantic	WRTNNCXA	Warrenton	Y	Entire
Surry Telephone Membership Corporation	BELHNCXA	Beulah	Y	Entire
Surry Telephone Membership Corporation	DBSNNCXA	Dobson	Y	Entire
Surry Telephone Membership Corporation	LVCRNCXA	Level Cross	Y	Entire
Surry Telephone Membership Corporation	RDBSNCXA	Red Brush	Y	Entire
Surry Telephone Membership Corporation	SHLSNCXA	Shoals	Y	Entire
Surry Telephone Membership Corporation	WSFDNCXA	Westfield	Y	Partial
Surry Telephone Membership Corporation	ZPHYNCXA	Zephyr	Y	Entire
Wilkes Telephone Membership Corp.	BOMRNCXA	Boomer	Y	Entire
Wilkes Telephone Membership Corp.	CHMPNCXA	Ferguson	Y	Partial
Wilkes Telephone Membership Corp.	CLNGNCXA	Clingman	Y	Entire
Wilkes Telephone Membership Corp.	HAYSNCXA	No. Wilkesboro	Y	Entire
Wilkes Telephone Membership Corp.	LOMXNCXA	Lomax	Y	Entire
Wilkes Telephone Membership Corp.	MLBYNCXA	No. Wilkesboro	Y	Entire
Wilkes Telephone Membership Corp.	NWBONCXA	No. Wilkesboro	Y	Entire
Yadkin Valley Telephone Membership Corporation	ADVNNCXA	ADVANCE	N	
Yadkin Valley Telephone Membership Corporation	BRKSNCXA	Hamptonville	Y	Partial
Yadkin Valley Telephone Membership Corporation	COLMNCXA	COOLEEMEE	N	
Yadkin Valley Telephone Membership Corporation	CRTYNCXA	COURTNEY	N	
Yadkin Valley Telephone Membership Corporation	EBNDNCXA	East Bend	Y	Partial
Yadkin Valley Telephone Membership Corporation	FRBSNCXA	Forbush	Y	Partial
Yadkin Valley Telephone Membership Corporation	HRMYNCXA	HARMONY	N	
Yadkin Valley Telephone Membership Corporation	IJAMNCXA	IJAMES	N	
Yadkin Valley Telephone Membership Corporation	NWHPNCXA	New Hope	Y	Partial
Yadkin Valley Telephone Membership Corporation	UNGVNCXA	Union Grove	Y	Partial

Exhibit E
DECLARATION



DECLARATION UNDER PENALTY OF PERJURY

I, Bradley Stein, do hereby declare under penalty of perjury as follows:

1. I am the Director – External Affairs of United States Cellular Corporation, the parent company of Petitioners North Carolina RSA #4, Inc., North Carolina RSA No. 6, Inc., USCOC North Carolina RSA #7, Inc., North Carolina RSA #9, Inc., Jacksonville Cellular Telephone Company and Wilmington Cellular Telephone Company (“US Cellular”).

2. This Affidavit is submitted in support of US Cellular’s Petition for Designation as an Eligible Telecommunications Carrier (“ETC”).

3. US Cellular currently provides cellular service in the North Carolina 4 Rural Service Area (“RSA”), North Carolina 6 RSA, North Carolina 7 RSA, North Carolina 9 RSA and the Jacksonville and Wilmington, North Carolina, Metropolitan Statistical Areas.

4. As a carrier not subject to state commission jurisdiction in the State of North Carolina, US Cellular is seeking designation as an ETC under Section 214(e)(6) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(e)(6).

5. US Cellular meets the criteria for ETC designation as explained herein.

6. US Cellular is a “common carrier” for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). A “common carrier” is generally defined in 47 U.S.C. § 153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)7 of the Commission’s Rules provides that cellular service is a common carrier service. *See* 47 C.F.R. § 20.9(a)(7).

7. US Cellular currently offers and is able to provide, within its designated service areas, the services and functionalities identified in 47 C.F.R. § 54.101(a). Each of these services and functionalities is discussed more fully below.

a. Voice-grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls within a bandwidth of approximately 2700 Hz within the 300 to 3000 Hz frequency range. *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) (“Universal Service Order”).* US Cellular meets this requirement by providing voice-grade access to the public switched

telephone network. Through its interconnection arrangements with local telephone companies, all customers of US Cellular are able to make and receive calls on the public switched telephone network within the specified bandwidth.

b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue. *See Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) (“October 1998 NPRM”). As it relates to local usage, the NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, *if any*, local usage should be required to be provided to customers as part of a universal service offering. *October 1998 NPRM*, 13 FCC Rcd at 21277-21281. In the *Universal Service Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide. *Universal Service Order*, 12 FCC Rcd at 8813. Any minimum local usage requirement established by the FCC as a result of the *October 1998 NPRM* will be applicable to all designated ETCs, not simply wireless service providers. US Cellular will comply with any and all minimum local usage requirements adopted by the FCC. US Cellular will meet the local usage requirements by including local usage as part of a universal service offering.

c. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. § 54.101(a)(3). US Cellular currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. US Cellular therefore meets the requirement to provide DTMF signaling or its functional equivalent.

d. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order*, 12 FCC Rcd at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. *Id.* US Cellular meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Enhanced 911 or E911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. *See id.* at 8815-17. US Cellular currently provides all of its customers with access to emergency service by dialing 911 in

satisfaction of this requirement. US Cellular will comply with all Phase II E-911 requirements.

f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Id.* at 8817-18. US Cellular meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXC's, etc.)

g. Access to interexchange service. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. "The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms." *Id.* at 8819. US Cellular presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXC's. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

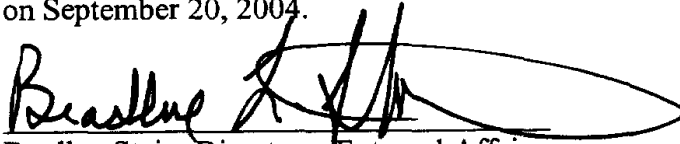
h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Id.* at 8821. US Cellular meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212".

i. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" service to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9). *See Universal Service Fourth Order on Reconsideration*, FCC 97-420 (Dec. 30, 1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. *Universal Service Order*, 12 FCC Rcd at 8821-22. US Cellular currently has no Lifeline customers in North Carolina because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. § 54.400-415. Once designated as an ETC, US Cellular will participate in Lifeline as required, and will provide its current toll blocking capabilities in satisfaction of the FCC's requirement. Today, the Company provides toll-blocking services for all international calls and toll blocking for selected customers. Accordingly, US Cellular currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.

8. US Cellular will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing conventional mobile cellular service customers.

9. I declare under penalty of perjury that the foregoing is true and correct.
Executed

on September 20, 2004.

A handwritten signature in black ink, appearing to read "Bradley Stein", followed by a large, sweeping horizontal flourish.

Bradley Stein, Director – External Affairs

North Carolina RSA #4, Inc.

North Carolina RSA No. 6, Inc.

USCOC North Carolina RSA #7, Inc.

North Carolina RSA #9, Inc.

Jacksonville Cellular Telephone Company

Wilmington Cellular Telephone Company

Exhibit F

HIGH-COST CERTIFICATION LETTER



September 20, 2004

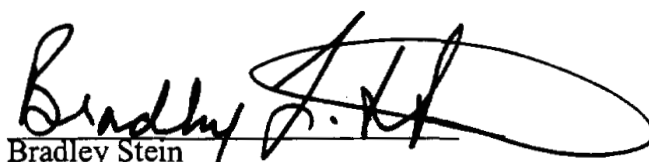
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: United States Cellular Corporation
High-Cost Certification**

To the Commission:

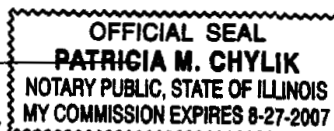
North Carolina RSA #4, Inc., North Carolina RSA No. 6, Inc., USCOC North Carolina RSA #7, Inc., North Carolina RSA #9, Inc., Jacksonville Cellular Telephone Company and Wilmington Cellular Telephone Company (collectively "US Cellular" and/or "Company") has submitted a Petition for ETC designation in the State of North Carolina as required by Sections 54.313(b) and 54.314(b) of the Federal Communications Commission's rules, 47 C.F.R. §§ 54.313(b), 54.313(b). US Cellular hereby submits the certification below in order to begin receiving high-cost support in its designated ETC area.

Accordingly, as Director – External Affairs of US Cellular, I hereby certify on behalf of the company and under penalty of perjury that all high-cost support provided to the Company will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996, 47 U.S.C. § 254(e). I also certify that I am authorized to make this certification on the company's behalf.


Bradley Stein
Director – External Affairs
9.20.04
Date

SUBSCRIBED, SWORN AND ACKNOWLEDGED before me this 20th day of September, 2004.


NOTARY PUBLIC



My Commission Expires: 8/27/07

Exhibit G

ANTI-DRUG ABUSE CERTIFICATION



DECLARATION UNDER PENALTY OF PERJURY

I, Bradley Stein, do hereby declare under penalty of perjury as follows:

1. I am the Director – External Affairs of United State Cellular Corporation, parent company of Petitioner North Carolina RSA #4, Inc., North Carolina RSA No. 6, Inc., USCOC North Carolina RSA #7, Inc., North Carolina RSA #9, Inc., Jacksonville Cellular Telephone Company and Wilmington Cellular Telephone Company (collectively, "Petitioner.")

2. To the best of my knowledge, the Petitioner referred to in the foregoing Petition, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non voting) of the applicant as specified in 1.2002(b) of the Commission's rules, are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

3. I declare under penalty of perjury that the foregoing is true and correct.
Executed on September 20, 2004

A handwritten signature in black ink, appearing to read "Bradley Stein", written over a horizontal line.

Bradley Stein, Director – External Affairs
United States Cellular Corporation

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. P-100, SUB 133c

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Designation of Carriers Eligible for Universal)
Carrier Support) **ORDER GRANTING PETITION**

BY THE COMMISSION: On August 22, 2003, North Carolina RSA3 Cellular Telephone Company, d/b/a Carolina West (Carolina West), a commercial mobile radio service (CMRS) provider, filed a Petition seeking an affirmative declaratory ruling that the Commission lacks jurisdiction to designate CMRS carrier eligible telecommunications carrier (ETC) status for the purposes of receiving federal universal service support.

In support of its Petition, Carolina West stated that it was a CMRS provider authorized by the Federal Communications Commission (FCC) to provide cellular mobile radio telephone service in North Carolina, and that the FCC had clearly recognized that CMRS carriers such as Carolina West may be designated as ETCs. ETC status is necessary for a provider to be eligible to receive universal service support. Section 214(e)(6) of the Telecommunications Act provides that if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC is charged with making the ETC determination. The FCC has stated that, in order for the FCC to consider requests pursuant to this provision, a carrier must provide an "affirmative statement" from the state commission or court of competent jurisdiction that the state lacks jurisdiction to perform the designation. To date, several state commissions have declined to exercise such jurisdiction.

North Carolina has excluded CMRS from the definition of "public utility." See, G.S. 62-3(23j). Pursuant to this, the Commission issued its Order Concerning Deregulation of Wireless Providers in Docket Nos. P-100, Sub 114 and Sub 124 on August 28, 1995, concluding that the Commission no longer has jurisdiction over cellular services. Accordingly, Carolina West has now requested the Commission to issue an Order stating that it does not have jurisdiction to designate CMRS carriers ETC status for the purposes of receiving federal universal service support.

WHEREUPON, the Commission reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that it should grant Carolina West's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status

for CMRS carriers. As noted above, in its August 28, 1995, Order In Docket Nos. P-100, Sub 114 and Sub 124, the Commission observed that G.S. 62-3(23)), enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission's jurisdiction. 47 USC 3(41) defines a "state commission" as a body which "has regulatory jurisdiction with respect to the intrastate operation of carriers." Pursuant to 47 USC 214(e)(6), if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC must determine which carriers in that class may be designated as ETCs. Given these circumstances, it follows that the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC. Accord.. Order Granting Petition, ALLTEL Communications, Inc., June 24, 2003.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 28th day of August, 2003.

NORTH CAROLINA UTILITIES COMMISSION



Patricia Swenson, Deputy Clerk

pb002803.01

Exhibit I